

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

FEDERAL TRADE COMMISSION and
PEOPLE OF THE STATE OF ILLINOIS,
Plaintiffs,
v.
GRUBHUB INC., a corporation, and
GRUBHUB HOLDINGS INC., a corporation,
Defendants.

Case No. 1:24-cv-12923

**JOINT MOTION FOR ENTRY OF
STIPULATED FINAL ORDER**

**JOINT MOTION FOR ENTRY OF STIPULATED FINAL ORDER FOR
PERMANENT INJUNCTION, MONETARY JUDGMENT, AND OTHER RELIEF**

Plaintiffs Federal Trade Commission (“FTC”) and People of the State of Illinois, by Kwame Raoul, Illinois Attorney General, and Defendants Grubhub Inc. and Grubhub Holdings Inc., jointly move this Court for entry of a Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief (“Stipulated Final Order”). In support of this motion, the parties state as follows:

1. Plaintiffs filed their Complaint for Permanent Injunction, Monetary Judgment, Civil Penalty Judgment, and Other Relief, alleging that Defendants violated Section 5(a) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 45(a), the Restore Online Shoppers’ Confidence Act (“ROSCA”), 15 U.S.C. § 8401 *et seq.*; the FTC’s Trade Regulation Rule entitled “Impersonation of Government and Businesses” (“Impersonation Rule”), 16 C.F.R. pt. 461, the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505 (“Consumer Fraud Act”), and the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS 510.

2. Pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b) and 57b, and Section 2 of the Consumer Fraud Act, 815 ILCS 505, the parties request entry of a Stipulated Final Order, which was reached through settlement negotiations between the parties and would fully resolve the case. Pursuant to the Court's Individual Rules, a copy of the Stipulated Order will be emailed to the Court.

3. The Stipulated Final Order has been signed by Defendants and their counsel. The Stipulated Final Order also has been approved by the FTC and the State of Illinois and signed by counsel.

Dated: December 17, 2024

Respectfully submitted,

FOR PLAINTIFF FEDERAL TRADE COMMISSION:

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**FOR DEFENDANTS GRUBHUB INC.
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